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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)

In Re Case Nos. 19-30088 and 19-30089
PG&E CORPORATION, CHAPTER 11
Debtor. (Joint Administration Pending)

In Re
PACIFIC GAS AND ELECTRIC COMPANY,
Debtor.

ENGINEERS AND SCIENTISTS OF CALIFORNIA LOCAL 20, IFPTE'S STATEMENT IN SUPPORT OF INTERIM RELIEF REQUESTED IN DEBTORS' EMPLOYEE WAGES AND BENEFITS MOTION AND RESERVATION OF RIGHTS

Date: January 31, 2019
Time: 10:00 a.m.
Place: Courtroom 17
450 Golden Gate Ave., 16th Floor,
San Francisco, CA

Engineers and Scientists of California Local 20, IFPTE (“ESC Local 20”), the exclusive collective bargaining representative of over 3,700 of Debtors’ professional and technical employees pursuant to a collective bargaining agreement with the Debtors, hereby submits this Statement of Support of Interim Order and Reservation of Rights in response to the Motion of

1 Debtors Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 507 and Fed. R. Bankr. P. 6003 and 6004
2 for Interim and Final Authority to (I) Pay Prepetition Wages, Salaries, Withholding Obligations,
3 and Other Compensation and Benefits; (II) Maintain Employee Benefits Programs; and (III) Pay
4 Related Administrative Obligations (the “Employee Wages and Benefits Motion”) (Doc. 8).

5 ESC Local 20 represents the engineers, estimators, mappers, project managers, and other
6 professional and technical employees that have been doing the important work needed to maintain
7 and modernize the systems and keep the public utility safe. As the Debtors have recognized, its
8 employees “are the lifeblood of the Debtors’ businesses—without them, the Debtors’ operations
9 would come to a halt” and “the Debtors’ customers in northern and central California would not
10 receive essential utility services.” Doc. 8, p. 12. A disruption in these employees’ earned wages
11 and benefits would expose these employees to serious financial difficulties and could result in
12 instability in the workforce—a risk that would be especially consequential given both the highly
13 specialized nature of many of the duties the employees perform and the critical nature of the
14 Debtors’ business as the sole utility provider to approximately 16 million customers.
15 Accordingly, the Debtors should be permitted to honor prepetition obligations to these employees
16 and maintain existing Employee Wage and Benefits Programs.

17 ESC Local 20 supports entry of the proposed interim order authorizing Debtors to pay
18 prepetition wages, salaries, withholding obligations and other compensation and benefits, and
19 authorizing the Debtors to maintain its Employee Wage and Benefits Programs (Doc. 8-1). ESC
20 Local 20 has certain questions related to the Employee Wages and Benefits Motion that it will
21 address with the Debtors before the entry of a final order, and therefore reserves all rights with
22 respect to entry of a final order.

23 Dated: January 30, 2019

WEINBERG, ROGER & ROSENFELD
A Professional Corporation

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26 By: /s/ Emily P. Rich
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Attorneys for Creditor Engineers and Scientists of
California, Local 20, IFPTE

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CERTIFICATE OF SERVICE

I am a citizen of the United States and an employee in the County of Alameda, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 1001 Marina Village Parkway, Suite 200, Alameda, California 94501.

I hereby certify that on January 30, 2019, I electronically filed the forgoing STATEMENT IN SUPPORT OF INTERRIM RELIEF REQUESTED IN DEBTORS' EMPLOYEE WAGES AND BENEFITS MOTION AND RESERVATION OF RIGHTS with the U.S. Bankruptcy Court, Northern District California, by using the Court's CM/ECF system.

Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On January 30, 2019, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

SEE ATTACHED SERVICE LIST

On (date) January 30, 2019, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

SEE ATTACHED SERVICE LIST

I certify under penalty of perjury that the above is true and correct. Executed at Alameda, California, on January 30, 2019.

/s/ Stephanie Mizuhara
Stephanie Mizuhara

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